

REMARKS

With this Response, Applicant respectfully requests that claims 9, 20, 31, and 42 be canceled without prejudice. Further, claims 1-3, 8, 11-14, 19, 22-25, 30, 34-36, 41, and 44 are amended herein. Therefore, claims 1-8, 10-19, 21-30, 32-41, and 43-44 are pending.

CLAIM REJECTIONS - 35 U.S.C. § 102

Claims 1-6, 8-9, 12-17, 19-20, 23-28, 30-31, 34-39, and 41-42 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,505,192 of Godwin et al. (*Godwin*).

Claims 9, 20, 31, and 42 are canceled herein, rendering rejection of these claims moot.

Applicant submits that the remaining claims are not anticipated by *Godwin* for at least the following reasons.

Claim 1 as amended herein recites the following:

receiving at a device driver a network packet having a corresponding security association (SA);

determining if the packet is an ingress packet or an egress packet;

determining for the packet a key value corresponding to the SA;

if the packet is an ingress packet, hashing the key value to determine a location of an entry in **an ingress lookup table**, and if the packet is an egress packet, hashing the key value to determine a location of an entry in **an egress lookup table**, the entry in the ingress lookup table and the entry in the egress lookup table containing information corresponding to the SA, the ingress lookup table **being a separate lookup table** from the egress lookup table;

retrieving from the entry an index to a location of the SA in memory; and

retrieving the SA from memory based on the index.

Claims 11, 22, and 33 recite similar limitations directed to determine if a packet is an ingress or egress packet, and determine the location of an entry in one of two separate lookup tables based on the determination.

Godwin discusses using a pseudo-connection memory block to store address and port information for packets to reduce search time for this information. In this way information can be cached and searched. See Abstract; col. 2, line 29 to col. 4, line 67. *Godwin* fails to disclose

or suggest the invention as claimed for at least the following reason. *Godwin* discloses a single memory block to store information for both outgoing and incoming packets. Col. 4, lines 33 to 34 state: "the source address and port is stored in **the** pseudo-connection memory block," and again at lines 62 to 64 states: "The above process is applied to outgoing packets using a connectionless protocol, except that the destination address and port are stored in **the** pseudo-connection memory block..." Emphasis added. No teaching or implication is given in the reference that would suggest to one of ordinary skill in the art that a separate ingress and egress lookup tables could be used or would be desirable, in contrast to the recitation of separate lookup tables in the claimed invention.

The Office Action at pages 3 to 4 asserts that the limitation of separate lookup tables is disclosed in *Godwin*. Applicant traverses. As set forth above, the portion of the reference cited in the Office Action teaches contrary to what is asserted in the Office Action, and so fails to support the assertion of the Office Action. Therefore, Applicant submits that the Office Action fails to set forth a prima facie case of anticipation under MPEP §2131, because the reference fails to disclose at least one element of the invention as recited in the independent claims.

Dependent claims necessarily include all the limitations of the claims from which they depend. Therefore, for at least the same reasons set forth above for claims 1, 11, 22, and 33, Applicant submits that the dependent claims are likewise not anticipated by the cited reference.

CLAIM REJECTIONS - 35 U.S.C. § 103

Claims 7, 18, 29, and 40

Claims 7, 18, 29, and 40 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Godwin* in view of Japanese Patent No. 03164866 of Kobayashi et al. (*Kobayashi*). The rejection of these claims is based on the anticipation rejection of the independent claims from

which these claims depend, which is addressed above. *Kobayashi* is recited as disclosing hash table collision tracking. Whether or not the reference discloses what is asserted in the Office Action, *Kobayashi* fails to cure the deficiencies of *Godwin* set forth above with respect to the independent claims. Thus, the references alone or in combination fail to render obvious the invention as recited in the independent claims, and so likewise fail to render obvious the invention as recited in these claims, which depend from the independent claims.

Claims 10-11, 21-22, 32-33, and 43-44

Claims 10-11, 21-22, 32-33, and 43-44 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Godwin* in view of U.S. Patent No. 6,460,122 of Otterness et al. (*Otterness*) and U.S. Patent No. 6,711,562 of Ross et al. (*Ross*). The rejection of these claims is based on the anticipation rejection of the independent claims from which these claims depend, which is addressed above. *Otterness* and *Ross* fail to cure the deficiencies of *Godwin* set forth above with respect to the independent claims. Thus, the references alone or in combination fail to render obvious the invention as recited in the independent claims, and so likewise fail to render obvious the invention as recited in these claims, which depend from the independent claims.

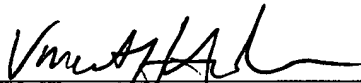
CONCLUSION

For at least the foregoing reasons, Applicants submit that the rejections have been overcome, placing all claims in condition for allowance. Such action is earnestly solicited. The Examiner is respectfully requested to contact the undersigned by telephone if such contact would further the examination of the present application.

Please charge any shortages and credit any overcharges to our Deposit Account number
02-2666.

Respectfully submitted,
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Date: 7/11/05



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